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14 Attorneys for Plaintiff SHELDON LOCKETT

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**UNITED STATES DISTRICT COURT**  
**FOR THE CENTRAL DISTRICT OF CALIFORNIA**

SHELDON LOCKETT; MICHELLE  
DAVIS; and CLYDE DAVIS,  
  
Plaintiffs,

v.

COUNTY OF LOS ANGELES, a  
public entity; LOS ANGELES  
COUNTY SHERIFF'S  
DEPARTMENT, a law enforcement  
agency; SHERIFF JIM  
McDONNELL; MIZRAIN ORREGO,  
a Deputy Los Angeles County Sheriff;  
SAMUEL ALDAMA, a Deputy Los  
Angeles County Sheriff; and DOES 1  
through 100, inclusive.,  
  
Defendants.

Case No.: 18-CV-5838-PJW  
*Assigned to Hon. Patrick J. Walsh,*  
*Magistrate Judge*

**PLAINTIFF'S THIRD  
SUPPLEMENTAL DISCLOSURES  
PURSUANT TO FEDERAL RULE  
OF CIVIL PROCEDURE 26(a)(1)**

1 Plaintiff hereby makes the following third supplemental disclosures pursuant  
2 to Federal Rule of Civil Procedure 26(a)(1):

3 PRELIMINARY STATEMENT

4 These disclosures are made solely for the purpose of this action and each  
5 disclosure is subject to all appropriate objections. All objections as to competency,  
6 relevance, materiality, admissibility, and any and all other objections that would  
7 require the exclusion of any witnesses or documents identified herein. Such  
8 objections are reserved and may be interposed at the time of trial.

9 It should be noted that this disclosing party has not yet completed  
10 investigation of the facts relating to this action, has not fully completed discovery in  
11 this action, and has not completed preparation for trial of this action. All of the  
12 disclosures contained herein are based only upon such information and documents  
13 as are presently available and disclose only those contentions which presently occur  
14 to this disclosing party.

15 Consequently, in that investigation and discovery continue, these disclosures  
16 are given without prejudice to the rights of the disclosing party, and plaintiffs  
17 reserve the right to change any and/or all disclosures herein as additional facts are  
18 ascertained, analyses are made, legal research is completed, and contentions are  
19 made. In addition, plaintiffs reserve the right to produce at the time of trial any and  
20 all subsequently discovered evidence relating to the proof of presently known  
21 material facts, and to produce all evidence, whether discovered, relating to the proof  
22 of subsequently discovered facts. The disclosures contained herein are made in a  
23 good faith effort to supply factual information and as much specification of legal  
24 contention as is presently known.

25 Except for explicit facts admitted herein, no admissions of any nature  
26 whatsoever are implied or should be inferred. The fact that the disclosure herein has  
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1 been provided should not be taken as an admission or acceptance of the existence of  
2 any fact or facts, or that such disclosure constitutes admissible evidence.

3 The foregoing is, by this reference, incorporated into each and every one of  
4 the following disclosures.

5 **SUPPLEMENTAL LIST OF DOCUMENTS**

6 In addition to the previously designated documents, Plaintiff, subject to and  
7 without waiving the foregoing objections, identifies the following documents that  
8 are all of the items identified as exhibits at depositions to date [Exhibits 1-118].

9 These items have all been produced at the various depositions in this case so copies  
10 are not provided

11 Additional exhibits not yet identified at depositions are marked as 151-204.

12 Copies of these documents are included in the shared DropBox link:

13 [https://www.dropbox.com/sh/a8anav38njpf3p/AACqO4bPfSSYnGLDNRAn](https://www.dropbox.com/sh/a8anav38njpf3p/AACqO4bPfSSYnGLDNRAnzdcQa?dl=0)  
14 [zdcQa?dl=0](https://www.dropbox.com/sh/a8anav38njpf3p/AACqO4bPfSSYnGLDNRAnzdcQa?dl=0)

15 A list of all exhibits is attached.

16 Plaintiff is informed and believes and thereon states that there are substantial  
17 additional exhibits anticipated to be identified at depositions; this list of exhibits will  
18 be supplemented as additional exhibits are identified.

19 **SUPPLEMENTAL LIST OF WITNESSES**

20 Plaintiff identifies the following individuals pursuant to F.R.C.P. 26(a)(1)(A).  
21 This identification is based on plaintiff's broad interpretation for disclosure and does  
22 not imply plaintiff's belief that these individuals have discoverable information  
23 relevant to the disputed facts. Based on such broad interpretation, the following are  
24 the names, addresses and telephone numbers of individuals who likely have  
25 discoverable information that the disclosing party may use to support his claims or  
26 defenses identifying the subjects of the information. Plaintiff will supplement the list  
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1 of witnesses, and subject of their testimony, to the extent required by F.R.C.P.  
2 26(a)(1)(A).

3 **A. PERCIPIENT WITNESSES**

4 In addition to the previously identified witnesses, plaintiff identifies the  
5 following employees of the Los Angeles County Sheriff's Department who may be  
6 contacted c/o Ivie, McNeill & Wyatt, 444 S. Flower St., 18th Floor, Los Angeles,  
7 CA 90071 as identified at the deposition of Deputy Austreberto Gonzalez:

8 35. Deputy Vega

9 36. Deputy Hernandez

10 37. Deputy Jaime Juarez

11 38. Deputy Jesus Sandoval

12 39. Deputy Cuvas

13 40. Deputy Aiya

14 41. Deputy Avalos

15 42. Deputy Self

16 43. Deputy Harris

17 44. Deputy Vasquez

18 45. Deputy Baray

19 46. Deputy Davila

20 47. Deputy O Saldana

21 48. Deputy D. Aviles

22 49. Deputy D. Ruiz Aguilar

23 50. Deputy J. Krase

24 51. Deputy R. Jimenez

25 52. Deputy P. Beserra

26 53. Deputy Eugene Contreras

27 54. Deputy O Covarrubias  
28

- 1 55. Deputy C. Del Castillo
- 2 56. Deputy S. Estrada
- 3 57. Deputy J. Sandoval-Mendoza
- 4 58. Deputy Iliana Vargas
- 5 59. Lt. John Wargo
- 6 60. Deputy Jonathan Alcala
- 7 61. Deputy Gabriel Guzman
- 8 62. Sgt. Andy Leos
- 9 63. Deputy Edwin Barajas
- 10 64. Deputy Anthony Bautista
- 11 65. Deputy Thomas Banuelos
- 12 66. Lt. Steven Ruiz
- 13 67. Captain LaTonya Clark
- 14 68. Deputy Adrian Garcia
- 15 69. Sgt. Frank Barragan
- 16 70. Lt. Nicole Palomino
- 17 71. Sgt. Barragan
- 18 72. Deputy Sergio Jimenez
- 19 73. Deputy Wanda Valiente
- 20 74. Deputy David Battles
- 21 75. Deputy Austreberto Gonzalez

22 Plaintiff is currently investigating the names of additional individuals who  
23  
24 may possess discoverable information concerning this case. Plaintiff reserves the  
25 right to supplement and/or modify the above list of individuals as the discovery in  
26 this case is ongoing and investigation continues.  
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**B. EXPERT WITNESSES**

Plaintiff intends to call those witnesses as identified on plaintiff's expert witness designation as well as to call witnesses as identified on defendants' expert witness designations.

DATED: September 14, 2020

THE SWEENEY FIRM

and

GLICKMAN & GLICKMAN,  
A LAW CORPORATION

By /s/ Steven C. Glickman

John E. Sweeney

Steven C. Glickman

Attorneys for Plaintiff

SHELDON LOCKETT

LOCKETT TRIAL EXHIBIT LOG

Ex #	Description	Date ID/Adm
1	[Lockett depo Vol 1, Ex. 1] Sheriff Dept. Supplemental Report	
2	[Lockett depo Vol 1, Ex. 2] 212 Bus Route	
3	[Lockett depo Vol 1, Ex. 3] Google Map with handwritten markings [Lockett depo Vol 1, Ex. 3A] Google Map	
4	[Lockett depo Vol 1, Ex. 4] Google Maps close up	
5	[Lockett depo Vol 1, Ex. 5] Photograph	
6	[Lockett depo Vol 1, Ex. 6] Photograph – Timothy Campbell's house	
7	[Lockett depo Vol 1, Ex. 7] Photograph	
8	[Lockett depo Vol 1, Ex. 8] Map marked by Lockett	
9	[Lockett depo Vol 1, Ex. 9] Photograph of area where Lockett was hiding	
10	[Lockett depo Vol 1, Ex. 10] Photograph of area where Lockett was hiding	
11	[Lockett depo Vol 1, Ex. 11] Photograph of area where Lockett was hiding	
12	[Lockett depo Vol 1, Ex. 12] Photograph of area where Lockett was hiding	
13	[Ross depo Ex 1] Notice of Depo for Ross	
14	[Ross depo Ex 2] Incident Report	
15	[Ross depo Ex 3] Photograph of house	
16	[Embleton Ex] Taser User Certification Course Materials	
17	[Embleton Ex] 2011 Electronic Control Weapon Guidelines	

18	[Embleton Ex] marked up version of Ex 12 – patio where Lockett found	
19	[Embleton Ex] Taser Evidence Sync	
20	[Embleton Ex] Embleton Narrative	
21	[Embleton Ex] Aldama tattoo	
22	[Lockett depo Vol 2 Ex] Lockett tattoo photos	
23	[Aldama depo Ex] set of Bates stamped documents	
24	[Aldama depo Ex] Transcription of Ivett Silva 911 call	
25	[Aldama depo Ex] tattoo photo 1	
26	[Aldama depo Ex] tattoo photo 2	
27	[Aldama depo Ex] tattoo photo 3	
28	[Aldama depo Ex] Mr Skully photo	
29	[Aldama depo Ex] LASD manual --Volume 3 – Chapter 1 – “policy and ethics”	
30	[Aldama depo Ex] NY times article	
31	[Aldama depo Ex] Google street view photo 1213 W Spruce – marked by Aldama at depo	
32	[Feria depo Ex] Ex 18 marked up by Feria	
33	[Thatcher depo Ex] Deposition notice for Thatcher	
34	[Thatcher depo Ex] LA Times article “LA County sheriff announces inquiry into secret societies of deputies and their tattoos”	
35	[Thatcher depo Ex] Motion by Supervisors Kuhl and Solis – 4/2019 “Assessing County Liability in Settlements Involving Sheriff ‘Gangs’”	



36	[Thatcher depo Ex] Los Angels County Sheriff Civilian Oversight Commission “Constitutional Implications of Investigating Deputy Cliques”	
37	[Campbell, T depo Ex] Notice of Deposition and Subpoena of Timothy Campbell	
38	[Campbell, T depo Ex] Defendant County of Los Angeles’ Amended Notice of Taking the Deposition of Timothy Campbell	
39	[Campbell, T depo Ex] Map	
40	[number skipped]	
41	[number skipped]	
42	[number skipped]	
43	[number skipped]	
44	[number skipped]	
45	[Campbell, G depo Ex] Subpoena for deposition	
46	[Campbell, E depo Ex] Subpoena for deposition	
47	[Campbell, E depo Ex] Color Printout of Google Maps View of 1213 West Spruce Street	
48	[Benzor depo Ex] Deposition notice for Benzor	
49	[Benzor depo Ex] Copy of Penal Code §118	
50	[Benzor depo Ex] POST Learning domain Chapter 6	
51	[Benzor depo Ex] Color photograph of leg tattoo	
52	[Benzor depo Ex] Photograph of Benzor’s tattoo on USB drive	
53	[Jaeger depo Ex] COLA’s Supplemental Resps to Plaintiff’s Special Rogs	
54	[Benzor depo Ex] Benzor’s Supplemental Report	

55	[Benzor depo Ex] Excerpts of Immunique Ross' Deposition	
56	[Orrego depo Ex] POST Learning Domain 1	
57	[Orrego depo Ex] POST Learning Domain 18	
58	[Orrego depo Ex] Aldama tattoo photo (from Taylor case)	
59	[Orrego depo Ex] Aldama tattoo photo (from LA times)	
60	[Orrego depo Ex] Orrego graphs -- Bates 1477-1478.pdf	
61	[Orrego depo Ex] Orange arrest documents -- Bates 302-319.pdf	
62	[Orrego depo Ex] 1213 W Spruce -- google street view.pdf	
63	[Orrego depo Ex] Bates 239 245 Broadcast.wav	
64	[Orrego depo Ex] TRANSCRIPT OF Bates 239 -- 3-17 PM CALL.pdf	
65	[Orrego depo Ex] Watch Commander Log - Bates 362-364.pdf	
66	[Orrego depo Ex] Map of area.pdf	
67	[Orrego depo Ex] Bates 238 10-33 Broadcast Rosecrans-Tajuata.wav	
68	[Orrego depo Ex] TRANSCRIPT OF Bates 238 -- 3-36 PM CALL.pdf	
69	[Orrego depo Ex] Patio (exterior) where Lockett found -- Bates 173.pdf	
70	[Orrego depo Ex] Patio where Lockett found -- Bates 171.pdf	
71	[Orrego depo Ex] Aldama and Orrego reports -- Bates 410-426.pdf	
72	[Aldama depo vol 2 Ex] Incident Report -- full set 13 pages	
73	[Aldama depo vol 2 Ex] Incident Thatcher 6-8-18 email -- Bates 1560-1561.pdf	

74	[Orrego depo Ex] TRANSCRIPT OF Bates 238 -- 3-36 PM CAL – corrected by OrregoL.pdf	
75	[30(b)(6) – Jaeger depo Ex] Notice of Continuance of Taking Deposition of Defendants County of Los Angeles and Los Angeles County Sheriff’s Department	
76	[30(b)(6) – Jaeger depo Ex] County of LA’s Objection to and Motion to Strike Plaintiff’s Motion in Limine to Exclude Reference to the Regulators	
77	[30(b)(6) – Tyler depo Ex] Notice of Continuance of Taking Deposition of Defendants County of Los Angeles and Los Angeles County Sheriff’s Department	
78	[30(b)(6) – Tyler depo Ex] 32 <sup>nd</sup> Semiannual Report by Special Counsel - Los Angeles County Sheriff’s Department May 2013	
79	[30(b)(6) – Tyler depo Ex] Exemplar Lancaster Sheriff tattoo	
80	[30(b)(6) – Tyler depo Ex] Rand “Understanding the Role of Subgroups Within the Los Angeles County Sheriff’s Department”	
81	[Patel depo] Patel reports	
82	[Patel depo] Photos of batons	
83	[Kuehn depo] Kuehn reports – Brain CT	
84	[Kuehn depo] Kuehn reports – chest x-ray	
85	[Kuehn depo] Baton photos	
86	[Reynolds depo] Cell phone record pages (7 pages)	
87	[Shinn depo] Shinn CV	
88	[Shinn depo] Shinn report	
89	[Shinn] Orrego tattoo 1 [back]	
90	[Shinn] Orrego tattoo 2 [front]	

91	[Shinn] Orrego tattoo 3 [center]	
92	[Garcia depo] Garcia report	
93	[Garcia depo] Excerpts from Thatcher depo	
94	[Garcia depo] Orrego arrest/booking stats	
95	[Garcia depo] Alsama arrest/booking stats	
96	[Garcia depo] [group of census documents from Garcia file]	
97	[Garcia depo] [list of attachments with ACS DP files]	
98	[Clark depo] Clark CV	
99	[Clark depo] “Materials Provided to Roger Clark” document	
100	[Clark depo] OSS tattoo	
101	[Clark depo] Banditos tattoo	
102	[Gabler depo] Gabler Preliminary Report	
103-1	[Eisen depo] Eisen report	
103-2	[Eisen depo] Eisen – table of witnesses	
103-3	[Eisen depo] Eisen – list of case materials	
104	[Eisen depo] Eisen – California Peace Officers Sourcebook (excerpt)	
105	[Gonzalez depo] Gonzalez – Claim for damages	
106	[Gonzalez depo] Gonzalez – shift list with Executioners and Prospects	
107	[Gonzalez depo] Gonzalez – signed Attachment to Protective Order - Gonzalez	
108	[Gonzalez depo] Gonzalez – signed Attachment to Protective Order - Romero	

109	[Gonzalez depo] Gonzalez – photo of Executioner mouse pad and mouse	
110	[Gonzalez depo] Gonzalez – Solomon video [retained by counsel]	
111	[Joshua depo] Joshua – email re production	
112	[Joshua depo] Joshua – Notice of Continuance of Deposition	
113	[Joshua depo] Joshua – copy of Dropbox page	
114	[Joshua depo] Joshua – screen shot of Hurrel letter	
115	[Orquilola depo] Orquilola – Preliminary Hearing Transcript	
116	[Orquilola depo] Orquilola – Criminal docket	
117	[Orquilola depo] Orquilola – Deposition Notice	
118	[Gonzalez depo] Gonzalez – Dominguez/Vargas Instagram video [retained by counsel]	
119 - 150	[reserved for additional deposition exhibits]	
151	Unofficial transcript from Los Angeles Southwest College	
152	Lyft ride receipt – 1/15/16 [separated out from Ex. 1]	
153	Supervisor's Report on Use of Force -- Bates 382-389.pdf	
154	Watch Commander's Service Comment Review -- bates 370-377	
155	Aldama graphs -- Bates 1417-1418.pdf	
156	Aldama history – Bates 1413-16; 1472	
157	Aldama training – Bates 275-285	

158	Orrego history – Bates 1473-76	
159	Orrego training – Bates 286-293	
160	Field identification card – Bates 1411-1412	
161	Felony Complaint – Bates 93-98	
162	Feria Narrative report – Bates 437	
163	Orrego tattoo photos (4)	
164	“Bates 232 Interview of Suspect Lockett”	
165	Transcript of “Bates 232 Interview of Suspect Lockett”	
166	“Bates 233 WC Interview”	
167	“Bates 234 WC interview cont”	
168	transcript of Bates 233 and 234 “WC Interview”	
169	“Bates 235 911B Oleander”	
170	Transcript of “Bates 235 911B Oleander”	
171	“Bates 236 1600608-1wd”	
172	Transcript of “Bates 236 1600608-1wd”	
173	“Bates 237 1600608-2cmp-01”	

174	Transcript of "Bates 237 1600608-2cmp-01"	
175	"Bates 240 280S and Aero Ack"	
176	Transcript of "Bates 240 280S and Aero Ack"	
177	"Bates 241 L-tac-5 011516 1510 to 1610 hrs"	
178	Transcript of "Bates 241 L-tac-5 011516 1510 to 1610 hrs"	
179	"Bates 242 Handling Unit Call Coordination"	
180	Transcript of "Bates 242 Handling Unit Call Coordination"	
181	"Bates 243 Suspect in Custody and Article Search"	
182	Transcript of "Bates 243 Suspect in Custody and Article Search"	
183	"Bates 244 Units responding to Oleander and Maple 245"	
184	Transcript of "Bates 244 Units responding to Oleander and Maple 245"	
185	"Bates 245 WC Bridge"	
186	Transcript of "Bates 245 WC Bridge"	
187	Crime Analysis Supp Form	
188	Patio where Lockett found -- Bates 172.pdf	
189	Personnel Investigation Report -- Bates 1333-1410.pdf	

190	Penal Code §69 Obstructing or resisting executive officer in performance of duties	
191	Penal Code §187 Murder defined	
192	Penal Code §246 Shooting at inhabited dwelling house occupied building vehicle or aircraft	
193	Penal Code §417 Drawing exhibiting or using firearm or deadly weapon self defense peace officer	
194	Penal Code §664 Attempts punishment	
195	Penal Code §12022.53 Sentence enhancements for persons convicted of enumerated felonies	
196	Penal Code §25400 Carrying concealed firearm punishment minimum sentence	
197	Penal Code §26100 Permitting loaded firearm in motor vehicle discharge of firearm from motor	
198	Compton Municipal Code 7-8.3	
199	Penal Code §186.22. Participation in criminal street gang	
200	Demographic Information for Compton chart [from Garcia report]	
201	Characteristic as a Percent of Total Population, Compton chart [from Garcia report]	



202	Orrego's Analysis Chart [from Garcia report]	
203	Aldama's Analysis Chart [from Garcia report]	
204	Drone video	

**PROOF OF SERVICE**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 9460 Wilshire Boulevard, Suite 330, Beverly Hills, California 90212.

On **September 14, 2020**, I served the foregoing documents described as:  
**PLAINTIFF'S THIRD SUPPLEMENTAL DISCLOSURES PURSUANT TO  
FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)** on the interested parties in  
this action:

**SEE ATTACHED SERVICE LIST**

**[xx] BY E-MAIL OR ELECTRONIC SERVICE:** I caused a copy of the document(s) to be sent from e-mail address [lupe.gallardo@glickman-law.com](mailto:lupe.gallardo@glickman-law.com) to the persons at the e-mail address(es) listed on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on **September 14, 2020**, at Sherman Oaks, California.

/s/ Steven C. Glickman  
Steven C. Glickman

**SERVICE LIST**

Lockett, et al. v. County of Los Angeles, et al.  
2:18-cv-5838-PJW

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